

Joyce W. Lindauer
State Bar No. 21555700
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
Dallas, Texas 75202
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
Email: joyce@joycelindauer.com
Attorneys for NATURAL FASHIONS, INC.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**SHAH NAWAZ FARASH, and
NIGHAT SHAH FARASH**

Debtors

§
§
§
§
§
§

**CASE NO. 22-41353-mxm13
Chapter 13**

**WITNESS AND EXHIBIT LIST FOR HEARING ON MOTION TO
DISMISS BANKRUPTCY CASE**

COMES NOW Natural Fashions, Inc. ("Movant"), a creditor in the above-styled and numbered bankruptcy case, and files this its *Witness and Exhibit List for Hearing on Motion to Dismiss Bankruptcy Case* scheduled on November 17, 2022.

Witnesses

At the hearing, Movant may call the following persons to testify as witnesses:

1. Shah Nawaz Farash
2. Nighat Shah Farash
3. Punnu Chopra
4. Henry Welles
5. Thomas D. McClintock
6. Any witness designated by any other party

Exhibits

At the hearing Movant may present one or more of the following exhibits:

Exhibit No.	Description	Offered	Admitted
1	Docket Sheet (Case No. 22-41353)		
2	Monthly Income Statements (Dec. 2021-May 2022) (Case No. 22-41353, Dkt. No. 25)		
3	Debtors' Schedules A-J (Case No. 22-41353, Dkt. No. 21)		
4	Debtors' Statement of Financial Affairs (Case No. 22-41353, Dkt. No. 23)		
5	Claims Register (Case No. 22-41353)		
6	Debtors' Chapter 13 Plan (Case No. 22-41353, Dkt. No. 26)		
7	Motion to Dismiss Case (Case No. 22-41353, Dkt. No. 56)		
8	Transcript of Proceedings dtd June 12, 2020 (Case No. 18-04160, Dkt. No. 54)		
9	Final Judgment of Non-Dischargeability (Case No. 18-04160, Dkt. No. 56)		
10	Abstract of Judgment dtd Aug. 17, 2016 (Case No. 141-286054-16)		
11	Abstract of Judgment dtd Sep. 16, 2020 (Case No. 141-286054-16)		
12	Letter from Receiver Thomas D. McClintock dtd Jul. 18, 2022, re: Disposition of Funds from BOK Accounts (Case No. 141-286054-16)		
13	Complaint for Copyright Infringement (E.D. CA Case No. 2:15-CV-0033, Dkt. No. 1)		

Exhibit No.	Description	Offered	Admitted
14	Order Granting Motion for Default Judgment (E.D. CA Case No. 2:15-CV-0033, Dkt. No. 25)		
15	Motion for Contempt, to Compel Compliance with Final Judgment of Injunction, for Coercive Sanction, and for Award for Compensatory Attorney Fees (E.D. CA Case No. 2:15-CV-0033, Dkt. No. 42)		
16	Order Granting Motion for Contempt, to Compel Compliance with Final Judgment of Injunction, for Coercive Sanction, and for Award for Compensatory Attorney Fees (E.D. CA Case No. 2:15-CV-0033, Dkt. No. 49)		
17	Kirby Drake Letter to Martha Geis dtd Nov. 5, 2019 re: Natural Fashions - Copyright Registrations		
18	Kirby Drake Letter to Lynne Arnold dtd Aug. 21, 2021 re: Natural Fashions – Copyright Registrations		
19	Kirby Drake Letter to Lynne Urquhart dtd Sep. 16, 2021 re: Natural Fashions – Copyright Registrations		
20	Kirby Drake Letter to Marc Austin dtd Aug. 23, 2021 re: Natural Fashions – Copyright Registrations		
21	Patternsbay website (1) marketing of garment as of April 9, 2022		
22	Patternsbay website (2) marketing of garment as of April 9, 2022		
23	Images from Parker Trade Show, San Antonio, Texas on Nov. 11-13, 2022		
	Any exhibits identified by any other party		

Movant reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and reserves the right to call additional witnesses and introduce additional exhibits in rebuttal. Movant further reserves the right to supplement this list prior to the hearing.

Dated: November 14, 2022.

Respectfully Submitted

/s/ Joyce W. Lindauer

Joyce W. Lindauer
State Bar No. 21555700
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
Dallas, Texas 75202
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
Attorneys for Natural Fashions, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 14, 2022, a true and correct copy of the foregoing document was served via email pursuant to the Court's CM/ECF system upon the parties receiving electronic notice in this case listed below.

Pam Bassel
fwch13cmecf@fwch13.com

Pam Bassel on behalf of Trustee Pam Bassel
fwch13cmecf@fwch13.com

Eboney D. Cobb on behalf of Creditor Crowley ISD
ecobb@pbfc.com, ecobb@pbfc.com; ecobb@ecf.inforuptcy.com

Lisa Large Evans on behalf of Creditor Tarrant County
Lisa.Evans@lgbs.com, Dora.Casiano-Perez@lgbs.com; Sean.french@lgbs.com; Michael.Alvis@lgbs.com; dallas.bankruptcy@lgbs.com

Joyce W. Lindauer on behalf of Creditor Natural Fashions, Inc.
joyce@joycelindauer.com, dian@joycelindauer.com; 12113@notices.nextchapterbk.com

Candace Meryl Murphy on behalf of Creditor CONVENTIONAL/ FHA/VA/RHS: Nationstar Mortgage LLC d/b/a Mr. Cooper.
ecfnotices@sissaclegallgroup.com, cmurphy@sissaclegallgroup.com

Warren V. Norred on behalf of Debtor Shah Nawaz Farash
warren@norredlaw.com,
anorred@norredlaw.com; angela@norredlaw.com; clayton@norredlaw.com; norredbk@gmail.com;
norredlawpllc@jubileebk.net

Warren V. Norred on behalf of Joint Debtor Nighat Shah Farash

warren@norredlaw.com,
anorred@norredlaw.com; angela@norredlaw.com; clayton@norredlaw.com; norredbk@gmail.com;
norredlawpllc@jubileebk.net

David L. Pritchard on behalf of Creditor Natural Fashions, Inc.

david@dlplegal.com, pritchardlawfirm@ecf.courtdrive.com

Grant Matthew Tabor on behalf of Creditor CONVENTIONAL/ FHA/VA/RHS: Nationstar Mortgage LLC d/b/a Mr. Cooper.

LOGSECF@logs.com, gtabor@logs.com

Grant Matthew Tabor on behalf of Creditor Nationstar Mortgage LLC dba Mr. Cooper

LOGSECF@logs.com, gtabor@logs.com

United States Trustee

ustpreion06.da.ecf@usdoj.gov

/s/ Joyce W. Lindauer

Joyce W. Lindauer